

WILLKIE FARR & GALLAGHER LLP

BENEDICT Y. HUR (SBN: 224018)

bhur@willkie.com

SIMONA AGNOLUCCI (SBN: 246943)

sagnolucci@willkie.com

EDUARDO E. SANTACANA (SBN: 281668)

esantacana@willkie.com

NOORJAHAN RAHMAN (SBN: 330572)

nrahman@willkie.com

ARGEMIRA FLÓREZ (SBN: 331153)

aflorez@willkie.com

HARRIS MATEEN (SBN: 335593)

hmateen@willkie.com

One Front Street, 34th Floor

San Francisco, CA 94111

Telephone: (415) 858-7400

Attorneys for Defendant

GOOGLE LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC, *et al.*,

Defendant.

Case No. 3:20-CV-04688 RS

**DECLARATION OF EDUARDO E.
SANTACANA IN SUPPORT OF
GOOGLE LLC'S MOTION TO
EXCLUDE OPINION OF PLAINTIFFS'
DAMAGES EXPERT MICHAEL J.
LASINSKI**

Date: October 5, 2023

Time: 1:30 p.m.

**Judge: Hon. Richard Seeborg
Ctrm. 3, 17th Floor, SF**

1 I, EDUARDO E. SANTACANA, declare:

2 1. I am an attorney licensed to practice law in the State of California and am a partner
3 with the law firm of Willkie Farr & Gallagher LLP, located at One Front Street, San Francisco,
4 California 94111, counsel for Defendant Google LLC (“Google”) in the above-captioned action.
5 Unless otherwise stated, the facts I set forth in this declaration are based on my personal
6 knowledge or knowledge I obtained through my review of corporate records or other
7 investigation. If called to testify as a witness, I could and would testify competently to such facts
8 under oath..

9 2. I submit this declaration in support of Google’s Motion to Exclude the Opinion of
10 Plaintiff’s Damages Expert Michael J. Lasinski.

11 3. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of the
12 deposition of Michael J. Lasinski, taken in this litigation on June 29, 2023.

13 4. Attached hereto as Exhibit 2 is a true and correct copy of the true and correct copy
14 of the Expert Rebuttal Report of Anindya Ghose, Ph.D, dated May 31, 2023.

15 5. Attached hereto as Exhibit 3 is a true and correct copy of the true and correct copy
16 of the Expert Rebuttal Report of Christopher R. Knittel, Ph.D, dated May 31, 2023.

17 6. Attached hereto as Exhibit 4 is a true and correct copy of an excerpt of the filed
18 Expert Report of Michael Lasinski in *Brown v. Google*, 4:20-cv-03664-YGR, 643-11 (filed Jul.
19 27, 2022).

20 7. Attached hereto as Exhibit 5 is a true and correct copy of the transcript of the
21 deposition of Jonathan Hochman, taken in this litigation on June 26, 2023.

22 8. Attached hereto as Exhibit 6 is a true and correct copy of the transcript of the
23 deposition of named plaintiff Susan Harvey, taken in this litigation on June 26, 2023.
24
25
26
27
28

9. Attached hereto as Exhibit 7 is a true and correct copy of the expert report of the Expert Rebuttal Report of John R. Black, Jr., Ph.D., dated May 31, 2023.

10. Attached hereto as Exhibit 8 is a true and correct copy of Appendices A-C & X1-X3 to the Expert Rebuttal Report of John R. Black, Jr., Ph.D., dated May 31, 2023.

11. Attached hereto as Exhibit 9 is a true and correct copy of Appendix X5 to the Expert Rebuttal Report of John R. Black, Jr., Ph.D., dated May 31, 2023.

12. Attached hereto as Exhibit 10 is a true and correct copy of Google's Second Supplemental Objections and Responses to Plaintiffs' Interrogatories Set Six, dated February 14, 2023.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: August 24, 2023

/s/ Eduardo E. Santacana
EDUARDO E. SANTACANA